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Attorneys for Defendant
ST. FRANCIS HOTEL CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FADUA GALDAMEZ, an individual,
Plaintiff,

vs.

ST. FRANCIS HOTEL CORPORATION,
dba THE WESTIN ST. FRANCIS
HOTEL, and DOES 1-10, inclusive,
Defendants.

Case No. 3:15-cv-01042-JST

**JOINT STIPULATION TO CONTINUE
FACTUAL DISCOVERY CUT-OFF;
~~[PROPOSED]~~ ORDER**

Complaint Filed: February 5, 2015

The parties, Plaintiff Fadua Galdamez ("Plaintiff") and Defendant St. Francis Hotel Corporation, dba The Westin St. Francis Hotel, by and through their attorneys of record hereby stipulate to the following continuance of the factual discovery cut-off. There is good cause to grant this continuance because the parties are engaged in settlement negotiations which, if successful, would result in a full dismissal of this action with prejudice. In the interest of

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avoiding the expenditure of costs to complete factual depositions while the parties discuss a potential informal resolution, and in consideration of the factual witnesses' availability in November and December 2015, the parties are agreeable to a brief continuance of the factual discovery cut-off.

The current factual discovery cut-off is November 20, 2015.

The parties request an extension of the factual discovery cut-off to January 15, 2016.

There have been no earlier extensions of the factual discovery cut-off.

This extension of time to January 15, 2016 does not affect other deadlines presently set by the Court.

SO STIPULATED.

Dated: November 9, 2015

HIRSCHFELD KRAEMER LLP

By: /s/ Kristin L. Oliveira

John F. Baum
Kristin L. Oliveira

Attorneys for Defendant
ST. FRANCIS HOTEL CORPORATION

Dated: November 9, 2015

MCCORMAC & ASSOCIATES

By: /s/ Valerie R. Perdue as authorized on 11/9/15

Kathleen A. McCormac
Valerie R. Perdue

Attorneys for Plaintiff
FADUA GALDAMEZ

~~PROPOSED~~ ORDER

Pursuant to the parties' Joint Stipulation, it is so ordered that the factual discovery cut-off is now January 15, 2016.

Dated: November 10, 2015

By: 

Hon. Jon S. Tiger
Judge of the United States District Court